

DATE REQUESTED	DOCUMENT REQUESTED	No. of Req.	OUTSTANDING DOCUMENTS
1/6/21	Production of Documents Request	#1	<ul style="list-style-type: none"> Def. have not produced any of its publicly released social media posts on Facebook, twitter, and any other social media outlets that it uses of the City of Wauwatosa, Dennis McBride, and the Wauwatosa Police Department as it relates to the curfew, proclamation of emergency. <p>11/23/21 Plaintiff's received BATES 18392 -021781 City of Wauwatosa Twitter Posts, 3300 + pages of social media post plus responses of the City of Wauwatosa posts on Twitter. (KM 12/05/21)</p>
		#2	<ul style="list-style-type: none"> Def. have not provided communications from the time period of 5/25/20 – 6/30/2020 & 12/13/20 – 4/16/21 in Def. possession that include the following search terms : curfew, emergency declaration, emergency order, state of emergency, proclamation of emergency, TPR, The People's Revolution <p>@ Plaintiffs narrowed to 5/25/20 – 10/13/20 for almost all search terms except for TPR & The People's Revolution from 5/25/20-12/13/20. (KM 12/05/21)</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p> <ul style="list-style-type: none"> Def. have not provided communications from the time period of 5/25/20 – 4/16/21 in Def. possession that include the following search terms: Alvin Cole, David Beth, John Martin Antaramian, John Chisholm, Governor Evers, and Daniel Miskinis <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#5	<ul style="list-style-type: none"> Def. have not provided all police reports, memorandums, arrest information, arrests data, booking information, any and all videos such as drone videos, squad videos, body cameras, video created by mobile phones, and audio recordings etc. for those who were surveilled, questioned, detained, ticketed, or arrested of all affiliated police departments who the WPD requested assistance of, such as the FBI, the U.S. Marshalls, the National Guard, in connection to the curfew imposed from October 7, 2020 – October 12, 2020.

			<p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p> <ul style="list-style-type: none"> • In particular, Def. have not provided interrogation footage from other sources that may be in their possession <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p> <p>* Some of the assisting agencies that WPD have various videos responsive to this request but have failed to provide include info from Bayside, Fond du Lac County, Glendale PD, Greendale PD, Waukesha Co., Waukesha PD, Winnebago Co.</p>
		#7	<ul style="list-style-type: none"> • It is unclear if the Def. have not provided all responsive documents, electronic communications audio, emails, text messages, from July 1, 2020 to December 31, 2020 between the Defendants and members of the Wauwatosa Police and Fire Commission in relation to protesting, the people's revolution, curfews, and police presence in the City of Wauwatosa between August 13, 2020 – October 14, 2020. Of note, def. have not provided any text messages that may be relevant to this request. <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p> <ul style="list-style-type: none"> • It is unclear if Def. have provided all documents, electronic communications audio, emails, text messages, from July 1, 2020 to December 31, 2020 between the Defendants and members of the Common Council in relation to protesting, the people's revolution, curfews, and police presence in the City of Wauwatosa between August 13, 2020 – October 14, 2020. <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
6/26/21	Plaintiff's 1 st Req. & Interrogatories	Inter. #1	Plaintiff's do not have all the names, job titles, email address, phone numbers, badge numbers, or ID's of all the people who had access to or received the TPR Target/Protestor List from 6/1/20 – 6/24/21.

			<p>No new information produced since Court Status 11/1/21 & meet and confer of 11/11/21 where it was communicated that Defendants have not provided all this information to Plaintiffs. (KM 12/05/21)</p>
		Inter. #2	<p>Plaintiff's do not have all the companies, governmental entities, non-governmental agencies, law enforcement agencies, of persons who had access or received the TPR Target/Protestor List from 6/1/20 – 6/24/21</p> <p>No new information since Court Status 11/1/21. (KM 12/05/21)</p>
		Inter. #3	<ul style="list-style-type: none"> • Plaintiffs do not have <u>any</u> social media handles and/or emails created by the City of Wauwatosa employees or WPD on Facebook, twitter, Instagram, reddit, viper, and any other social media sites used to surveil and/or engage with any persons on the TPR Target list <p>Defendants have provided no social media handles since the Court Status of 11/1/21. Defendants have provided the name of La'Sha Jones as a name purportedly used for a facebook account. Defendant's gave a nonactive Instagram name used to perhaps set the account up – again not a social media handle, they claim that a twitter account has been deactivated and cannot remember the name, and they provided the general login to facebook. (KM 12/05/21)</p> <ul style="list-style-type: none"> • It is unclear if Plaintiffs have received all social media handles and emails used by the City of Wauwatosa employees or WPD such as on Facebook, twitter, Instagram, reddit, viper, and any other social media sites used to survey and/or engage with any persons on the Protestor list – to date Plaintiffs have received Confidential Informant (CI) info from persons working with the WPD but only for Facebook social media and no other social media CI social media handles <p>Defendants have provided no social media handles since the Court Status of 11/1/21. Defendants have provided the name of <u>La'Sha Jones</u> as a name purportedly used for a facebook account. Defendant's gave a nonactive Instagram name used to perhaps set the account up – again not a social media handle, they claim that a twitter account has been deactivated and cannot remember the name, and they provided the general login to facebook (KM 12/05/21)</p>

3/29/21	Deposition of Barry Weber	#1-3	<p>General deposition standard: Any and all documents to which you may refer in your deposition and/or testimony in any hearing in this matter; Any and all copies of any written correspondence upon which you rely to support your claims and professional assessment, evaluation and/or conclusions; Any and all documents you intend to introduce or rely upon at trial in this case. (No documents directly related to Weber were produced at this deposition)</p> <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
7/26/21	Dominick Ratkowski Depo Notice	#2	<p>It is unclear if defendants provided all documents including social media, social media handles, recordings (including but not limited to FBI live, Instagram live, etc.) copies in relation to any emergency situations in Wauwatosa; and also any credible and serious threats of violence and vandalism, including but not limited to the burning down of Mayfair Mall, concerns of outside agitators that were received, viewed, or created by you and/or any of the agents of the city, including WPD officers and any/all agents participating and/or coordinating, collaborating, at the behest of the Defendant City from May 25, 2020 – present.</p> <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#3	<p>Defendants have not provided Any and all social media handles created on behalf of the WPD used to monitor any persons from May 25, 2020 through the present. (<i>Similar to above 6/26/21 Interrogatory #3</i>)</p> <p style="background-color: yellow;">Defendants have provided no social media handles since the Court Status of 11/1/21. Defendants have provided the name of <u>La'Sha Jones</u> as a name purportedly used for a facebook account. Defendant's gave a nonactive Instagram name used to perhaps set the account up – again not a social media handle, they claim that a twitter account has been deactivated and cannot remember the name, and they provided the general login to facebook. (KM 12/05/21)</p>
		#10	<p>Defendants have not provided all metadata of emails as well as any attachments to emails that were sent to, emails sent from, or emails received at the email address of dratkowski@wauwatosa.net and text messages sent to or from 414-688-0079 (<i>no text messages received to date</i>) from</p>

			<p>the dates of May 25, 2020 through present regarding the following :</p> <ul style="list-style-type: none"> - protesting in the City of Wauwatosa from June 1, 2020 through present - law enforcement operations in regards to the October 7 – 12, 2020 curfew in Wauwatosa - any and all emails that mention or refer to the following persons and search terms : <p>Kathryn Knowlton, Kimberley Motley, Deja Vishny, Alvin Cole, Tracy Cole, Taleavia Cole, David Bowen, John Larry, Mary Lockwood, Khalil Coleman, Jacqueline Bogenberger, Kyle Rittenhouse, Gaige Grosskreutz, Antifa, the People's Revolution, TPR, BLM, Kenosha, George Floyd, Jacob Blake, curfew tickets, Barry Weber.</p> <p>At the meet and confer of 11/11/21 Plaintiffs deleted the search terms Kyle Rittenhouse, Antifa, Kenosha, and curfew tickets. Plaintiffs narrowed Deja Vishny to 6/1/20 – 11/1/20; Alvin Cole 5/25/20 – 10/13/20 ; Jacob Blake 8/23/20 – 10/13/20. All other search terms for #10 are to be searched from 5/25/20 – 6/24/21. (KM 12/05/21)</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
7/26/21	Joseph Roy Depo Notice	Req. #4	<p>Defendant's have not provided all <u>metadata of emails</u>, attachments to emails, text correspondence, communications to or from any federal agencies, local agencies, persons, which refer to or are about the Protestor List or the Protestor folder. <i>This would include media outlets.</i></p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		Req. #5	<p>It is unclear if defendants have provided all <u>metadata of emails</u>, attachments to emails, text correspondence, communications to or from any federal agencies or agents including but not limited to persons from the FBI, U.S. Attorney's Office, U.S. Marshals, CIA, the Department of Homeland Security, the FAA, (ICE Immigration and Customs Enforcement), the state or federal National Guard which you sent, received, or have in your possession that refer or are about protesting and or about curfews from May 25, 2020 to present.</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>

		Req. #6	<p>It is unclear if defendants have provided all metadata of emails, attachments to emails, text correspondence, communications to or from any local law enforcement agencies which you sent, received, or have in your possession that refer or are about protesting and or about curfews from May 25, 2020 to present.</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		Req. #7	<p>It is unclear if defendants have provided all metadata of emails, attachments to emails, text correspondence, communications to or from Dominick Ratkowski, Barry Weber, any Wauwatosa Police Officers, James Archambo, Dennis McBride, any Wauwatosa Common Council Members, members of the PFC, any federal agencies, any local law enforcement agencies, any private business entities, and local and federal governmental entities, which you sent, received, or have in your possession that refer or are about protesting and/or about curfews from May 25, 2020 to present.</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
7/27/21	James Archambo Depo Notice	#3	<p>Def. have not produced James Archambo's most recent employment contract per 2.08.090 and job description which includes duties, responsibilities, expectations, rubric for evaluation (blank); and any/all other conditions of employment;</p> <p>Plaintiffs received Archambo's Contract on 11/23/21. (KM 12/05/21)</p>
		#4	<p>Def. have not produced any contracts/agreements/MOUs between both the City and/or the WPD with Brookfield Property Retail Group and/or Brookfield Asset Management, its representatives, agents, assigns;</p> <p>At the 11/11/21 meet and confer Plaintiffs stated that all contracts that Defendant were in that satisfied this request from 5/25/20 – 11/11/21 (KM 12/05/21)</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#5	Def. have not produced any contracts/agreements/MOUs

			<p>between both the City and/or the WPD with CVMIC, its representatives, agents, assigns;</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#6	<p>Def. have not produced any contracts/agreements/MOUs between both the City and/or the WPD which support the Wauwatosa Intelligence Systems Information, including all applicable policies, equipment lists, personnel contacts, trainings, impacted technology (Cellebrite, etc.);</p> <p>Defendant's gave an invoice from Cellebrite that was sent to Joseph Lewandowski for 2/5/21 – 2/4/22 – BATES 21786. (KM 12/05/21)</p> <p>At the 11/11/21 meet and confer Plaintiffs stated that all contracts that Defendant were in that satisfied this request from 5/25/20 – 11/11/21. (KM 12/05/21)</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#7	<p>Def. have not produced any contracts/agreements/MOUs between both the City and/or the WPD with state and federal Department of Transportation, state and federal Department of Motor Vehicles, FBI, Homeland Security, US Marshalls, CIA and/or US Attorney's Office;</p> <p>Defendant's produced a unilateral agency agreement purportedly between WPD and Wisconsin DOJ only signed by Barry Weber on 3/16/21. There was no signature by DOJ. (KM 12/05/21)</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#8	<p>Def. have not produced any and all communication between the City and/or the WPD with the FAA of requests, responses, directives, policies, citations regarding drone operation in and/or by Wauwatosa from June 1, 2020 through December 1, 2020;</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#9	<p>Def. have not produced any and all communication and contact information, and including formal and informal communication/agreement, whether or not reduced to writing, of all contracts/agreements/MOUs (written or oral)</p>

			<p>between both the City and/or the WPD with any non-government entities, including volunteers, private businesses, non-profits, etc. regardless of formal organized corporation status between June 1, 2020 and December 1, 2020;</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p> <p>Def. have specifically not produced Contract between the City of Wauwatosa and Attorney George Schimmel between 6/1/20 – 12/1/20</p> <p>Defendant's indicated that there is no contract between the City and Attorney George M. Schimmel (KM 12/05/21)</p>
7/29/21	Luke Vetter Depo Notice	#2	Def. have not produced all documents including social media copies in relation to any emergency situations in Wauwatosa; and also any credible and/or serious threats of violence and vandalism, including but not limited to the burning down of Mayfair Mall, concerns of outside agitators that were received, viewed, or created by any Defendants and/or agents/employees of the Defendants from May 25, 2020 – October 14, 2020.
		#3	Def. have not produced all metadata of emails, attachments to emails, text correspondence, communications to or from any federal agencies, local agencies, persons, which refer to or are about the TPR Target/Protestor List or the Protestor folder.
		#6	Def. have not produced Meta data of any and all documents pertaining to WPD file numbers 20-12965, 20-13276, 20-13093 (Taleavia Cole),
		#7	<ul style="list-style-type: none"> Def. have not produced Metadata of email and/or letter to David Clarke about protesting in Wauwatosa Nov. 2020 from Luke Vetter – Def. gave a pdf document in BATES 17088

			<p>Defendant's communicated to the court that Plaintiffs would receive by 11/8/21 two specific emails - the metadata of email & email sent by Luke Vetter to Clarke and the metadata & email as received by Barry Weber. (KM 12/05/21)</p> <p>Defendant's & Plaintiffs mutually agreed that the software sheet of the emails would be for attorney eyes only. (KM 12/05/21)</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#8	<p>Def. has not produced in relation to Vetter all metadata of emails as well as any attachments to emails that were sent to, emails sent from, or emails received at the email addresses of : WUPDCP@wauwatosa.net ; lvetter@wauwatosa.net, and any other emails that you used regarding the below from the dates of May 25, 2020 through present regarding the following :</p> <ul style="list-style-type: none"> - protesting in the City of Wauwatosa from June 1, 2020 through present - law enforcement operations in regards to the October 7 – 12, 2020 curfew in Wauwatosa - any and all emails that mention or refer to the following persons and search terms : Kathryn Knowlton, Kimberley Motley, Deja Vishny, Alvin Cole, Tracy Cole, Taleavia Cole, David Bowen, John Larry, Mary Lockwood, Khalil Coleman, Jacqueline Bogenberger, Kyle Rittenhouse, Gaige Grosskreutz, Antifa, the People's Revolution, TPR, BLM, Kenosha, George Floyd, Jacob Blake, curfew tickets, Barry Weber. <p>Nothing produced since Court Status 11/1/21. (KM 12/05/21)</p>
		#9	<p>It is unclear if Def. have produced all reports, notes, emails, messages in any form which refer to or about any forms of force used by any law enforcement against anyone from May 25, 2020 through October 13, 2020.</p> <p>Nothing produced since Court Status 11/1/21. (KM 12/05/21)</p>

08/19/21	Martin Keck Depo Notice	#3	<p>It is unclear if defendant's have produced any and all metadata of emails, attachments to emails, text correspondence, communications to or from any federal agencies, local agencies, persons, which refer to or are about the Protestor List or the Protestor folder from May 25, 2020 through the present.</p> <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#6	<p>Defendant have not produced any social media handles created and/or social media handles used to monitor, target, and/or surveil anyone on the TPR Target/Protestor List from May 25, 2020 through present.</p> <p style="background-color: yellow;">Defendants have provided no social media handles since the Court Status of 11/1/21. Defendants have provided the name of <u>La'Sha Jones</u> as a name purportedly used for a facebook account. Defendant's gave a nonactive Instagram name used to perhaps set the account up – again not a social media handle, they claim that a twitter account has been deactivated and cannot remember the name, and they provided the general login to facebook. (KM 12/05/21)</p>
		#7	<p>It is unclear if defendants have produced all metadata of emails, attachments to emails, text correspondence, communications to or from any federal agencies or agents including but not limited to persons from the FBI, U.S. Attorney's Office, U.S. Marshals, CIA, the Department of Homeland Security, (ICE Immigration and Customs Enforcement), the state or federal National Guard which you sent, received, or have in your possession that refer or are about protesting and or about curfews from May 25, 2020 to present.</p> <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#8	<p>It is unclear if defendants have produced all metadata of emails, attachments to emails, text correspondence, communications to or from any local law enforcement agencies which you sent, received, or have in your possession that refer or are about protesting and/or about curfews from May 25, 2020 to present.</p> <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>

		#10	<p>Def. have not produced all metadata of emails, emails, as well as any attachments to emails that were sent to, emails sent from, or emails received from May 25, 2020 through present regarding the following :</p> <ul style="list-style-type: none"> - protesting in the City of Wauwatosa from June 1, 2020 through present - law enforcement operations in regards to the October 7 – 12, 2020 curfew in Wauwatosa - any and all emails that mention or refer to the following persons and search terms : <p>Kathryn Knowlton, Kimberley Motley, Deja Vishny, Alvin Cole, Tracy Cole, Taleavia Cole, David Bowen, John Larry, Mary Lockwood, Khalil Coleman, Jacqueline Bogenberger, Kyle Rittenhouse, Gaige Grosskreutz, Antifa, the People's Revolution, TPR, BLM, Kenosha Guard, Proud Boys, terrorist, right wing extremist, domestic terrorist, Robin Vining, and Trump.</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
08/20/21	Shane Wrucke Depo Notice <i>(identical as to Keck above, and also missing:)</i>	#2	<p>Defendant's have not produced all documents including social media copies in relation to any emergency situations in Wauwatosa ; and also any credible and/or serious threats of violence and vandalism, including but not limited to the burning down of Mayfair Mall, concerns of outside agitators that were received, viewed, or created by any Defendants and/or agents/employees of the Defendants from May 25, 2020 – October 14, 2020.</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#11	<p>It is unclear if defendant's have produced all copies of any written correspondence upon which you rely to support your claims and professional assessment, evaluation and/or conclusions, and including warrants, applications, and/or probable cause for phone/electronic device searches;</p> <ul style="list-style-type: none"> • Defendant did not produce the 2 search warrant applications for Taleavia Cole's phone as testified to by Wrucke in his deposition <p>Plaintiff's received unsigned search warrant draft applications prior to the 11/1/21 status conference. It is unclear if the unsigned draft applications were what Defendant Wrucke referred to in his deposition. (KM 12/05/21)</p>

09/16/21	Production of Documents Request	#1	<p>Please provide any and all written memoranda, reports, correspondence, documents, photographs, diagrams, videos whether it be by body camera, vehicle/dashcam video, telephone video, recorded statements and any other writings pertaining to protesting in the city of Wauwatosa from May 25, 2020 through present which are in any of the named Defendant's or their designees possession, custody and/or control at any time.</p> <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#2	<p>Any and all metadata of emails in native form, attachments to emails, text correspondence, communications to or from any federal agencies, local agencies, persons, private entities, NGO's, or any persons or entities which refer to, have attached as a document, or are about the "TPR Target List," including by any other name, and/or the Protestor Folder as created by Defendant Dominick Ratkowski in any configuration from May 25, 2020 through the present.</p> <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#3	<p>Please produce any and all metadata of emails in native form as well as any attachments to emails that were sent to, emails sent from, or emails received at the email addresses of : mcleecovid@googlegroups.com from the dates of May 25, 2020 through present that are in the possession of any of the Defendants or their designees.</p> <p style="background-color: yellow;">@meet & confer of 11/11/21 Plaintiff's narrowed the date to search to 5/25/20 – 12/13/20. (KM 12/05/21)</p> <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#4	<p>Please produce any and all metadata of emails in native form as well as any attachments to emails that mention or refer to the following persons and search terms : Kimberley Motley, Deja Vishny, Kathryn Knowlton, Milo Schwab, Tracy Cole, Taleavia Cole, John Larry, Khalil Coleman, Jacqueline Bogenberger, Mariah Smith, Gaige Grosskreutz, Joey Koepp, Breon Foster, Sean Kafer, Antifa, the People's Revolution, TPR, and BLM that are in the Defendant's possession or their designees from May 25, 2020 through present.</p>

			<p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#5	<p>Please Produce any and all emails from May 25, 2020 through present from the emails of tcourt@wauwatosa.net, erondeau@wauwatosa.net, rbloczynski@wauwatosa.net, GSchimmel@Schimmel-Law.com, bweber@wauwatosa.net, jfarina@wauwatosa.net, and lvetter@wauwtosa.net that refer to and or mention whether explicitly or implicitly the following people and search terms: Tracy Cole, Taleavia Cole, Tahudah Cole, Tristiana Walls, Andrew Aaron, Kamila Ahmed, Robert Agnew, Isiah Baldwin, Jacqueline Bogenberger, Lavita Booker, Rebecca Burrell, Raine Cich, Khalil Coleman, Steven Conklin, Lauryn Cross, Rachel Dulay, Anne Delessio-Parson, Erik Fanning, Jessica Fenner, Jill Ferguson, Breon Foster, Joanna Geisler, Christine Groppi, Gaige Grosskreutz, Joseph Hayes, Percy Hayes, Destiney Jones, Adante Jordan, Mary Kachelski, Sean Kafer, Joey Koepp, John Larry, Alex Larson, Sonora Larson, Holly Lavora, Lazarito Matheu, Vaun Mayes, Molly Nilssen, Shawn Page, Carmen Palmer, (juvenile) Palmer 1, (juvenile) Palmer 2, Leah Porter, Aidali Rivera, William Rivera, Hector Rodriguez, Jose Hernandez Ramirez, Oscar Concepcion Rodriguez, Rosalind Rogers, Nathan Sabel, William Schroeder, Madeliene Schweitzer, Mariah Smith, Peter Sparks, Tiffany Stark, Angel Vega, Christina Vitolo-Haddad, Gabriella Vitucci, Oscar Walton, Jayden Welch, Britta Welch, Suzanne Wells, Brandon Wilborn, Trisha Wilson, KatelynWojnar, Sonja Worthy, and members of TPR which are in any of the named Defendant's Possession or their designees from May 25, 2020 through present.</p> <p style="background-color: yellow;">Plaintiffs @ meet and confer narrowed the date of the search to 5/25/20 – 12/15/20. (KM 12/05/21)</p> <p style="background-color: yellow;">Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>
		#7	Please produce the contract, terms of reference, employment personnel file and/or employment file of George Schimmel and/or Schimmel Law Offices that he or his entity has with the City of Wauwatosa during the

			<p>entirety of this contractual relationship with the City of Wauwatosa.</p> <p>Defendant's communicated that George M. Schimmel did not have a contract/employment file/and personnel file with the City of Wauwatosa despite the assertions that he is a "contract attorney for the city of Wauwatosa." (KM 12/05/21)</p> <p>Defendants have not produced any terms of reference for George M. Schimmel which can be produced through the city bid documents for his position. (KM 12/05/21)</p> <p>Defendants have not produced any documents responsive to this request since Court Status of 11/1/21. (KM 12/05/21)</p>